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page 559 from Jane Taylor Read, Frank P. Read and Kate G. Read and Fred A. Read and Fay E. Read, the heirs of Edmund S. Read who departed this life sometime in 1927 as being shown on a copy of said Deed attached hereto and prayed to be taken as Plaintiff's Exhibit B.

- 3. That the said Edmund S. read acquired the subject along with Nellie D. Vinal, an "unmarried lady" as joint tenants from Ida M. Vinal, widow, by deed dated December 18, 1922 and recorded among the Land Records of Frederick County in Liber 342, folio 54, the whereabouts, date of death, and heirs, if any of Ida M. Vinal being unknown to the Plaintiff. As being shown on a copy of said Deed attached hereto and prayed to be taken as Plaintiff's Exhibit C.
- 4. That the said premises now and has since January 10, 1928 contained a dwelling house and been occupied by the said Virdie May Creed family and Virginia M. Creed, her family and tenants and the premises are of great value to the Plaintiff and that the Plaintiff and her family have been for a period of over 48 years preceding the commencement of this action, and still is in possesion of said premises and have paid any and all taxes due on said property and that the possession has been at all times open, notorious, continuous, uninterrupted and adverse, and under claim of right and color of title as against the whole world.
 - 5. That the Plaintiff has no adequate remedy at law.
- 6. That by a contract of sale between Virginia M. Creed, seller and Andrew D. Arnold and Janet D. Arnold, his wife, buyers the subject property was to be sold and pursuant to the terms of said contract the seller agreed to convey to the buyers a good and merchantable title, which under the cloud on the title as hereinabove described the seller is unable to do as being shown on a copy of said Contract of Sale attached hereto and prayed to be taken as Plaintiff Exhibit D.

WE!NBERG, MICHEL,
& STERN

10 WEST COLLEGE TERRACE

AND

106 WEST SECOND STREET

FREDERICK, MARYLAND

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